

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PALMER GARDENS, LLC, RACHEL
GERSTEIN, JOYCE GERSTEIN, HERBERT
GERSTEIN, ALAN MALTZ, JANET MALTZ,
HUBERT TSAI, CHRISTINE SINGH, XUE
FENG, RANDALL A. MECKEL, HENRY
GROSS, BEAVER METAL, LLC, ACACIO
RODRIGUEZ, CREDIBOX UNIVERSAL, SL,
FELISA HERNANDEZ, MICHAEL HADJEDJ,
and OLIVER DACOURT,

Plaintiffs,

- against -

BAYROCK/SAPIR ORGANIZATION LLC,
DONALD J. TRUMP, ALEX SAPIR, TEVFIK
ARIF, 246 SPRING STREET HOLDINGS II, LLC,
BAYROCK/SAPIR REALTY LLC, BAYROCK
SPRING STREET, LLC, BAYROCK GROUP,
LLC, JULIUS SCHWARZ, TRUMP
INTERNATIONAL HOTELS MANAGEMENT
LLC, TRUMP MARKS SOHO LLC, DONALD
TRUMP JR., IVANKA TRUMP, ERIC TRUMP,
PRODIGY INTERNATIONAL NYC, LLC,
RODRIGO NINO, CORE GROUP MARKETING
LLC, SHAUN OSHER, THOMAS POSTILIO and
AKERMAN SENTERFITT LLP, as ESCROW
AGENT,

Defendants.

X

Case No.: 10 Civ. 5830 (KMW)

RULE 7.1 STATEMENT

X

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Bayrock/Sapir Organization LLC, 246 Spring Street Holdings II, LLC, Bayrock/Sapir Realty LLC, Bayrock Spring Street, LLC, Bayrock Group, LLC, Trump International Hotels Management LLC, Trump Marks Soho LLC and Prodigy International NYC, LLC, non-governmental limited liability companies, certifies as follows:

(1) Bayrock/Sapir Organization LLC is a limited liability company and a wholly-owned subsidiary of 246 Spring Street Holdings II, LLC, and no publicly held corporation owns 10 percent or more of its stock:

(a) 246 Spring Street Holdings II LLC is a limited liability company, which is owned by Bayrock/Sapir Organization Realty LLC and Bayrock/Sapir Organization Holdings LLC, and no publicly held corporation owns 10 percent or more of its stock;

(b) Bayrock/Sapir Organization Realty LLC is a limited liability company, which is owned by Sapir Organization Spring Street LLC, Trump Soho Member LLC, Bayrock Spring Street LLC and Donka Soho Member LLC, and no publicly held corporation owns 10 percent or more of its stock;

(c) Bayrock/Sapir Organization Holdings LLC is a limited liability company, which is owned by Sapir Organization Spring Street LLC, Bayrock Spring Street LLC, Trump Soho Member LLC and Donka Soho Member LLC, and no publicly held corporation owns 10 percent or more of its stock;

(d) Sapir Organization Spring Street LLC is a limited liability company and a wholly owned subsidiary of The Sapir Group LLC, and no publicly held corporation owns 10 percent or more of its stock; and

(e) The Sapir Group LLC is a limited liability company with no corporate parents or owners.

(2) 246 Spring Street Holdings II LLC is a limited liability company, which is owned by Bayrock/Sapir Organization Realty LLC and Bayrock/Sapir Organization Holdings LLC, and no publicly held corporation owns 10 percent or more of its stock:

(a) Bayrock/Sapir Organization Realty LLC is a limited liability company, which is owned by Sapir Organization Spring Street LLC, Trump Soho Member LLC, Bayrock Spring Street LLC and Donka Soho Member LLC, and no publicly held corporation owns 10 percent or more of its stock;

(b) Bayrock/Sapir Organization Holdings LLC is a limited liability company, which is owned by Sapir Organization Spring Street LLC, Bayrock Spring Street LLC, Trump Soho Member LLC and Donka Soho Member LLC, and no publicly held corporation owns 10 percent or more of its stock;

(c) Sapir Organization Spring Street LLC is a limited liability company and a wholly owned subsidiary of The Sapir Group LLC, and no publicly held corporation owns 10 percent or more of its stock; and

(d) The Sapir Group LLC is a limited liability company with no corporate parents or owners.

(3) Bayrock/Sapir Realty LLC is a non-existent entity. Therefore, Bayrock/Sapir Realty LLC has no parent corporation and no publicly held corporation owns 10 percent or more of its stock.

(4) Bayrock Spring Street, LLC is a limited liability company and a wholly-owned subsidiary of Bayrock Group, LLC, and no publicly held corporation owns 10 percent or more of its stock.

(5) Bayrock Group, LLC is a limited liability company, which is owned in part by RIF International Group, Inc., and no publicly held corporation owns 10 percent or more of its stock.

(6) Trump International Hotels Management LLC is a limited liability company, which is owned in part by TIHM Member Corp., and no publicly held corporation owns 10 percent or more of its stock.

(7) Trump Marks SoHo LLC is a limited liability company, which is owned in part by Trump Marks Soho License Corp., and no publicly held corporation owns 10 percent or more of its stock.

(8) Prodigy International NYC, LLC is a limited liability company and a wholly owned subsidiary of Prodigy Development Sales, LLC, and no publicly held corporation owns 10 percent or more of its stock:

(a) Prodigy Development Sales, LLC is a limited liability company which is owned in part by SDS Prodigy, LLC, and no publicly held corporation owns 10 percent or more of its stock;

(b) SDS Prodigy, LLC is a limited liability company and a wholly owned subsidiary of SDS Investments, LLC, and no publicly held corporation owns 10 percent or more of its stock; and

(c) SDS Investments, LLC is a limited liability company with no corporate parents, and

no publicly held corporation owns 10 percent or more of its stock.

Dated: White Plains, New York
November 17, 2010

KURZMAN EISENBERG CORBIN & LEVER,
LLP

By: 

Fred D. Weinstein, Esq.

One North Broadway
White Plains, NY 10601
(914) 285-9800

Attorneys for Defendants
Bayrock/Sapir Organization LLC, 246 Spring
Street Holdings II, LLC, Bayrock/Sapir Realty
LLC, Bayrock Spring Street, LLC, Bayrock Group,
LLC, Trump International Hotels Management
LLC, Trump Marks SoHo LLC, and Prodigy
International NYC, LLC